| 1 | DANIEL J. HILL, ESQ. NV Bar # 12773 | | |
|----|---|--|--|
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| 6 | Attorney for Defendant Ammon E. Bundy | | |
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| 8 | UNITED STATES DISTRICT COURT | | |
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| 10 | DISTRICT OF NEVADA | | |
| 11 | UNITED STATES OF AMERICA, | CASE NO.: 2:16-cr-00046-GMN-PAL | |
| 12 | Plaintiff, | STIPULATION TO EXTEND | |
| 13 | VS. | DEADLINE FOR DEFENDANT AMMON BUNDY'S REPLY IN | |
| 14 | AMMON E. BUNDY, et al., | SUPPORT OF HIS MOTION TO DISMISS THE INDICTMENT FOR | |
| 15 | Defendants. | DESTRUCTION OF EVIDENCE (ECF No. 833) | |
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| 17 | This is Defendant Ammon Bundy's ("Amm | non") and the United States' stipulation to extend the | |
| 18 | deadline for Ammon to file his reply in support of his motion to dismiss the indictment for destruction | | |
| 19 | of evidence (ECF No. 833). The motion was filed on October 10, 2016. The government filed its | | |
| 20 | response (ECF No. 948) on November 9, 2016. The current due date is November 16, 2016. The | | |
| 21 | parties now agree that Ammon shall have up to and including November 22, 2016 to file his reply. | | |
| 22 | Although undersigned counsel has been actively working on the reply, Ammon only recently | | |
| 23 | arrived in the District, and counsel has been unable to review all of the discovery necessary to | | |
| 24 | complete the reply. Counsel is actively working to free his calendar as trial approaches, and does not | | |
| 25 | anticipate any further delays. | | |
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| 1 | This request for an extension is made in good faith and not for the purpose of delay. Therefore, | |
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| 2 | Ammon respectfully requests, and the government agrees, that the reply deadline be extended to | |
| 3 | November 22, 2016. | |
| 4 | | |
| 5 | DATED this 16th day of November 2016. | DATED this 16th day of November 2016. |
| 6 | WOLF, RIFKIN, SHAPIRO, SCHULMAN & RABKIN, LLP. | UNITED STATES ATTORNEY |
| 7 | | |
| 8 | By: <u>/s/ Daniel J. Hill</u> | By: /s/ Nicholas D. Dickinson, Esq. |
| 9 | DANIEL J. HILL, ESQ. Nevada Bar No. 12773 3556 E. Russell Road, Second Floor Las Vegas, Nevada 89120 | NICHOLAS D. DICKINSON, ESQ. Nevada Bar No. |
| 10 | | 501 Las Vegas Blvd., South Suite 1100 Las Vegas, Nevada 89101 |
| 11 | Attorney for Defendant Ammon E. Bundy | Attorneys for the United States of America |
| 12 | | |
| 13 | <u>ORDER</u> | |
| 14 15 | IT IS SO ORDERED. | |
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| 17 | November 17, 2016 | Jugg a. Jeen |
| 18 | DATED | UNITED STATES DISTRICT JUDGE/ UNITED STATES MAGISTRATE JUDGE |
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